

Exhibit “C”

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATALIE SOTO,

Plaintiff,

Civil Action

File No.: **1:24-cv-02911-SDG**

v.

WENDELL HOLMES, JR.,

Defendant.

AFFIDAVIT OF DAWN DOUGLAS

Personally appeared before the undersigned attesting officer, duly authorized to administer oaths, Dawn Douglas, who having been duly sworn, on oath states and deposes as follows:

1.

I am over the age of 18 and am competent to make this affidavit.

2.

Prior to the events set forth in this affidavit, I did not know Natalie Soto and had never communicated with her.

3.

I am on Facebook as “Dawn Douglas” and, in early 2022, I joined a Facebook group called “Are we dating the same guy?” This group consists of women who are seeking information about the men they are dating or have dated,

in order to identify those men who are involved in relationships with several women at the same time.

4.

On or about February 16, 2024, I was looking at the “Are we dating the same guy?” Facebook group and saw that, in one of the discussions, a group member, Natalie Soto, had posted the photo of a man whom she identified only as “Wendell” and had added the following caption to the photo: “If you see this man, run.”

5.

Natalie Soto advised me and others in the Facebook group that “Wendell” was married or in a relationship, while at the same time claiming to be single on dating apps.

6.

Under Natalie Soto’s “If you see this man, run” post, I commented that I recognized the man “Wendell” in the photo from having met him on a dating app years ago. I further explained to Ms. Soto that I had communicated with this man on the dating app, and then later on social media such as Instagram, but that I had never met him in person and had not been aware that he was married.

7.

In late February of 2024, I started to receive unsolicited direct messages

through Facebook messenger from one Wendell Holmes, Jr.

8.

The Facebook messages I received from Wendell Holmes, Jr. were vulgar, inappropriate and harassing in nature, and his language indicated that he had seen my reply to Natalie Soto's "If you see this man, run" post. Mr. Holmes also began sending me direct messages of a harassing nature on Instagram. In each instance, I blocked Mr. Holmes after he had messaged me on social media.

9.

After blocking Mr. Holmes on my social media, I received harassing text messages from him on my cell phone. I then blocked Mr. Holmes' number on my phone.

10.

On or about February 23, 2024, I sent Natalie Soto's Facebook account a private message regarding the harassing messages I had been receiving from Wendell Holmes, Jr.

11.

On or about February 23, 2024, I posted a public Facebook comment on Natalie Soto's page, informing her that I had just sent her a private message, to which Ms. Soto later responded.

12.

After my initial private message to Natalie Soto and my public comment on her page, Ms. Soto and I continued to communicate with one another via Facebook private message. I sent Ms. Soto images and screenshots of the vulgar and inappropriate messages that Mr. Holmes had been sending me on Facebook and Instagram.

13.

During this exchange, I provided Natalie Soto with one of the harassing communications that I had received from Mr. Holmes, which contained a full frontal nude photo depicting Ms. Soto, as well as another nude photo of an unidentified woman.

14.

By sending me the above described communication containing the two photos, Wendell Holmes, Jr. used the internet and/or cellular networks to disclose to me a photo of Natalie Soto where she appears in the nude.

15.

Per my communications with Natalie Soto, Ms. Soto did not in any way consent to this disclosure of her photo to me by Mr. Holmes. I likewise did not consent to the disclosure of this photo of Natalie Soto to me by Mr. Holmes.

Further affiant sayeth not.

Dawn Douglas
Dawn Douglas

Sworn to and subscribed before me
this 9th day of April, 2025.

Peter J. Shelton
Notary Public
My commission expires: June 27, 2028

